

## COVINGTON

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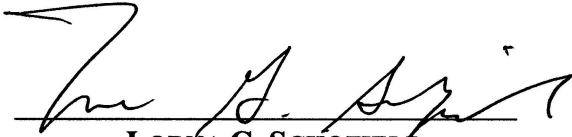
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Application GRANTED. The application is untimely but is nevertheless granted. The parties shall file the joint status letter, pursuant to the order at Dkt. No. 574, by **August 21, 2020**.

Dated: August 10, 2020  
New York, New York

Re: *Nypl, et al. v. JPMorgan Chase & Co., et al.*  
S.D.N.Y. Case No. 1:15-CV-09300 (LGS)



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

Dear Judge Schofield:

This firm is counsel to the Citi defendants in the above-referenced action. I write with the consent of all parties referenced below to request an adjournment of the August 7, 2020 deadline for a joint letter about the status of certain discovery issues. No extensions of this deadline have previously been requested.

Your Honor's Order of June 4, 2020 ([ECF No. 547](#)) permitted plaintiffs to serve interrogatories on defendants Barclays, Citi, JPMorgan, RBS, and UBS "to address the threshold question of what communications, if any, each Defendant had with the Government relating to the plea agreements" referenced in the stipulation the Court approved on March 18, 2018 ([ECF No. 425](#)). Pursuant to the June 4 Order, plaintiffs served a Fourth Set of Interrogatories on each of these defendants on June 11. On July 1, the parties reported to the Court concerning the terms of an agreement for defendants to serve responses to these interrogatories by July 27. ([ECF No. 573](#).) On July 2, the Court entered an endorsement order approving that agreement, and asked the parties to file a joint status letter by August 7 (today) to "(1) apprise the Court of the status of the interrogatory responses, any supplemental responses and any related disputes; (2) inform the Court of whether Plaintiffs intend to seek depositions based on the interrogatory responses, the proposed dates for any such depositions and any related disputes; and (3) propose appropriate amendments to Sections II and IV of the Third Amended Civil Case Management Plan and Scheduling Order ([Dkt. No. 548](#))."<sup>1</sup> ([ECF No. 574](#).)

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<sup>1</sup> Section IV of the Third Amended Civil Case Management Plan has already been amended by this Court. See [ECF No. 615](#), Fourth Amended Civil Case Management Plan and Scheduling Order, at 1-2 (July 31, 2020).

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Defendants served responses to the above-referenced interrogatories on July 27. Plaintiffs have indicated they would benefit from additional time to consider next steps. To accommodate this request, to allow sufficient time for the parties to meet and confer to try to narrow any potential disputes, and in light of vacation schedules, the parties respectfully propose to proceed as follows: Plaintiffs will notify defendants by August 14 whether they are seeking supplementation of the July 27 interrogatory responses and/or depositions, and what amendments, if any, they are seeking to Sections II and IV of the scheduling order. Defendants reserve all rights with respect to any requests plaintiffs may make. The parties will then meet and confer on these issues during the week of August 17, and will file the joint status letter previously requested by the Court by 6 p.m. ET on August 21.

Respectfully submitted,

s/ Andrew A. Ruffino

cc: All Counsel (by ECF)